

A49

R. Wilde

FEB 17 1982

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MEMORANDUM FOR: John D. Evans, Assistant Chief  
Program Support Branch, NMSS

FROM: Ralph M. Wilde, Program Assistant  
Division of Fuel Cycle and Material Safety

SUBJECT: PROPOSED LICENSE FEE REVISION - CASEWORK  
REVIEW EFFORT

In an attempt to provide a broader statistical base from the review effort in various license fee categories, we have recalculated average staff hours required from pooled data for FY80 and FY81. The data for case completions by program code were obtained from end-of-year computer runs from FY80 and FY81. These groupings by program code were then assigned appropriate PPSAS codes. Staff review hours were taken directly from the end-of-year PPSAS runs and grouped by the PPSAS codes corresponding to the case completion codes. Staff time includes both regular and overtime hours. Matching data pair sets consisting of case completions and associated staff hours for each fiscal year were then assigned to the appropriate fee category. Note: Glenda Jackson, LFMB, provided the listing of the PPSAS codes that are included in each fee category. The cases and the staff review hours were then pooled for each fee category and the average staff review time calculated. No adjustments were made to the raw computer data for case completions and review hours. In those instances where the matching data pair set was incomplete, that is, zero was reported for either case completions or hours, the set was rejected and not included in the pooled data for calculation of averages. A dash in the average column indicates that an average could not be determined. We believe that this is a more realistic way of presenting the data than to arbitrarily designate the midpoint of the range estimates as the average.

The data are presented in table form in Enclosure 1 and Enclosure 2. Enclosure 1 gives average staff review time of professionals only. Enclosure 2 gives average staff review time of professionals and licensing assistants in the fee categories for which licensing assistants charged time. It is our opinion that licensing assistant and professional review time should both be included. The licensing assistants are doing professional work and are actually performing reviews for some of the less complex cases. These reviews would have been performed by professionals if the licensing assistants were not available to do these cases.

8502130095 840730

PDR FOIA

REYNOLD84-564 PDR

OFFICE  
NAME  
DATE

FEB 17 1982

- 2 -

We recognize that there are some apparent inconsistencies for the staff review times within some fee categories and between some fee categories. Even with these inconsistencies, the averages, based on actual data, are probably better for most types of reviews than the estimates that were provided previously for FY77. Because we are now presenting averages based on actual data we have chosen not to include the low and high estimates for each type of review.

We have not responded specifically to each item listed in the February 10, 1982 memorandum from Mr. Donoghue to Mr. Davis because many of the relationships both within fee categories and between fee categories have changed with the inclusion of FY80 data and with the more rigorous rejection of incomplete matching data pair sets. With regard to item 6, the computer data does not differentiate between (1) safety and environmental and (2) administrative amendments for Category 4.B.

Original signed by

Ralph M. Wilde, Program Assistant  
Division of Fuel Cycle and  
Material Safety

Enclosures:

1. Professional time
2. Professional & Licensing  
Assistants time

DISTRIBUTION: NMSS #82-0129  
FC Central File  
NMSS r/f  
FC File  
RMWilde  
VLMiller  
LWalker  
JHickey  
WWalker  
BClausser  
ABentley

OFFICE	FC						
NAME	RMWilde/cj						
DATE	2/17/82						

INFORMATION FOR LICENSE FEES

PROFESSIONAL & LICENSING ASSISTANT PROCESSING TIME

FY80 & FY81 PPSAS DATA

PRESENT FEE CATEGORIES

SAFETY REVIEW  
STAFF HOURS

3. BYPRODUCT MATERIAL - CON'T

Low      High      Average

CASES

STAFF HOURS

I. Licenses issued pursuant to § 32.18 of this chapter to distribute quantities of byproduct material to persons exempt from the licensing requirements of Part 30 of this chapter.

New License

Renewal

Amendment

J. Licenses issued pursuant to § 32.14 of this chapter to distribute timepieces, hands and dials, containing hydrogen 3 or promethium 147 to persons exempt from the licensing requirements of Part 30 of this chapter.

New License

Renewal

Amendment

K. Licenses for possession and use of byproduct material for research and development, except those licenses covered by Categories 3A or 3B, and licenses covered by Categories 7B or 7C authorizing medical research

New License

Renewal

Amendment

19.1

16.2

2.6

53

86

480

1011.5

1391.0

1267.9

OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

INFORMATION FOR LICENSE FEES

PROFESSIONAL & LICENSING ASSISTANT PROCESSING TIME

FY80 & FY81 PPSAS DATA

PRESENT FEE CATEGORIES

SAFETY REVIEW  
STAFF HOURS

3. BYPRODUCT MATERIAL - CON'T
- L. All other specific byproduct material licenses, except those in Categories 4A through 10B.

	<u>Low</u>	<u>High</u>	<u>Average</u>
New License			3.4
Renewal			5.3
Amendment			1.8

<u>CASES</u>	<u>STAFF HOURS</u>
926	3123.7
607	3196.1
2049	3746.1

4. WASTE DISPOSAL

- B. Waste disposal licenses specifically authorizing the receipt of waste byproduct material, source material, or special nuclear material from other persons for the purpose of packaging the material. The licensee will dispose of the material by transfer to another person authorized to receive or dispose of the material.

New License  
Renewal  
Amendment

- C. Waste disposal licenses specifically authorizing the receipt of prepackaged waste byproduct material, source material, or special nuclear material from other persons. The licensee will dispose of the material by transfer to another person authorized to receive or dispose of the material.

New License  
Renewal  
Amendment

OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

INFORMATION FOR LICENSE FEES

PROFESSIONAL & LICENSING ASSISTANT PROCESSING TIME

FY80 & FY81 PPSAS DATA

PRESENT FEE CATEGORIES

SAFETY REVIEW  
STAFF HOURS

Low      High      Average

CASES

STAFF HOURS

7. HUMAN USE OF BYPRODUCT MATERIAL, SOURCE MATERIAL, OR SPECIAL NUCLEAR MATERIAL

B. Licenses issued pursuant to Parts 30, 40, and 70 of this chapter to medical institutions, or two or more physicians on a single license, for human use of byproduct material, source material, or special nuclear material, except licenses in Category 7A.

New License

Renewal

Amendment

9.6

3.9

455

4366.7

2078

8077.8

C. Licenses issued pursuant to Parts 30, 40, and 70 of this chapter to an individual physician for human use of byproduct material, source material, or special nuclear material, except licenses in Category 7A.

New License

Renewal

Amendment

0.8

10.2

1.6

24

19.8

16

163.7

162

258.5

8. CIVIL DEFENSE

A. Licenses for possession and use of byproduct material, source material, or special nuclear material for civil defense activities.

New License

Renewal

Amendment

11.6

1.8

3

35.0

36

63.0



INFORMATION FOR LICENSE FEES

PROFESSIONAL & LICENSING ASSISTANT PROCESSING TIME

FY80 & FY81 PPSAS DATA

PRESENT FEE CATEGORIES

5. WELL LOGGING AND WELL SURVEYS  
AND TRACER STUDIES

A. Licenses for possession  
and use of specific nuclear  
material and/or byproduct  
material for well logging,  
well surveys, and tracer  
studies.

New License  
Renewal  
Amendment

<u>Low</u>	<u>High</u>	<u>Average</u>
		0.2
		28.1
		4.8

CASES

STAFF HOURS

47

292.0

13

365.2

98

465.7

6. NUCLEAR LAUNDRIES

A. Licenses for commercial  
collection and laundry of  
items contaminated with  
byproduct material,  
source material, or special  
nuclear material.

New License  
Renewal  
Amendment

7. HUMAN USE OF BYPRODUCT  
MATERIAL, SOURCE MATERIAL, OR  
SPECIAL NUCLEAR MATERIAL

A. Licenses issued pursuant  
to Parts 30, 40, and 70  
of this chapter for human  
use of byproduct material,  
source material, or special  
nuclear material in sealed  
sources contained in  
teletherapy devices.

New License  
Renewal  
Amendment

OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

INFORMATION FOR LICENSE FEES

PROFESSIONAL & LICENSING ASSISTANT PROCESSING TIME

FY80 & FY81 PPSAS DATA

PRESENT FEE CATEGORIES

SAFETY REVIEW  
STAFF HOURS

Low      High      Average

CASES

STAFF HOURS

9. DEVICE, PRODUCT, OR SEALED  
SOURCE SAFETY EVALUATION

- A. Safety evaluation of  
devices or products  
containing byproduct  
material, source  
material, or special  
nuclear material, except  
reactor fuel devices and  
devices or products  
distributed to general  
licensees or persons  
exempt from the require-  
ments for a license  
pursuant to Parts 30, 40,  
and 70 of this chapter.

Evaluation

- B. Safety evaluation of  
sealed sources containing  
byproduct material, source  
material, or special  
nuclear material except  
reactor fuel and sealed  
sources distributed to  
general licensees or  
persons exempt from the  
requirements for a license  
pursuant to Parts 30, 40,  
and 70 of this chapter.

Evaluation

Fee categories 9A & 9B

INFORMATION FOR LICENSE FEES

PROFESSIONAL & LICENSING ASSISTANT PROCESSING TIME

FY80 & FY81 PPSAS DATA

PRESENT FEE CATEGORIES

SAFETY REVIEW  
STAFF HOURS

10. POWER SOURCE:

Low      High      Average

CASES

STAFF HOURS

A. Licenses for the manufacture and distribution of encapsulated byproduct material or special nuclear material for use in power generation, except reactor fuel.

New License

Renewal

Amendment



INFORMATION FOR LICENSE FEESPROFESSIONAL PROCESSING TIMEFY80 & FY81 PPSAS DATAPRESENT FEE CATEGORIESSAFETY REVIEW  
STAFF HOURS

	<u>Low</u>	<u>High</u>	<u>Average</u>
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CASESSTAFF HOURS

1. SPECIAL NUCLEAR MATERIAL						
I. Licenses for possession and use of special nuclear material in sealed sources contained in devices used in industrial measuring systems.	New License		4.3		3	13.0
	Renewal		1.3		65	82.0
	Amendments		0.5		74	37.5
J. All other special nuclear material licenses, except licenses authorizing special nuclear material in unsealed form in combination that would constitute a critical quantity as defined in § 150.11 of Part 150 which shall pay the same rate as Category 1A and special nuclear material for use in power generation which shall pay the fee in Category 10.	New License		0.5		5	2.5
	Renewal		0.5		2	1.0
	Amendments		2.0		6	12.0
2. SOURCE MATERIAL						
D. All other source material licenses (Does not include milling, in-situ leaching heap leaching, refining uranium mill concentrates to UF <sub>6</sub> ore buying stations and ion exchange facilities.)	New License		14.0		10	140.0
	Renewal		6.2		47	291.7
	Amendments		3.8		121	464.8

1/ Professional Staff Hours

OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDSINFORMATION FOR LICENSE FEESPROFESSIONAL PROCESSING TIMEFY80 & FY81 PPSAS DATAPRESENT FEE CATEGORIESSAFETY REVIEW  
STAFF HOURS

		<u>Low</u>	<u>High</u>	<u>Average</u>	<u>CASES</u>	<u>STAFF HOURS</u>
3. BYPRODUCT MATERIAL						
A. License for possession and use of byproduct material issued pursuant to Parts 30 and 33 of this chapter for processing or manufacturing of items containing byproduct material for commercial distribution.	New License			0.8	38	31.5
	Renewal			3.7	48	178.0 ✓
	Amendment			0.5	173	91.5
B. Licenses issued pursuant to §§ 32.77, 32.73 and 32.74 of this chapter authorizing the processing or manufacturing and distribution of radio-pharmaceuticals, generators or reagents kits, and sources and devices, containing byproduct material.	New License			24.4	12	292.7
	Renewal			16.4	10	164.0
	Amendment			3.9	117	452.0
C. Licenses for byproduct material issued pursuant to Part 34 of this chapter for industrial radiography operations at one location.	New License			19.3	11	212.5
	Renewal			13.2	51	674.8 ✓
	Amendment			2.4	109	262.9
D. Licenses for byproduct material issued pursuant to Part 34 of this chapter for industrial radiography operations at more than one location.	New License			8.9	19	170.0
	Renewal			30.3	49	1483.5 ✓
	Amendment			7.5	101	761.2

INFORMATION FOR LICENSE FEESPROFESSIONAL PROCESSING TIMEFY80 & FY81 PPSAS DATAPRESENT FEE CATEGORIES3. BYPRODUCT MATERIAL - CON'TSAFETY REVIEW  
STAFF HOURS

	<u>Low</u>	<u>High</u>	<u>Average</u>
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CASESSTAFF HOURS

E. Licenses for possession and use of byproduct material in sealed sources for irradiation of materials where the source is not removed from its shield (self-shielded units).

New License

4.1

17

70.0

Renewal

3.0

47

139.5

Amendment

2.0

63

126.0

F. Licenses for possession and use of byproduct material in sealed sources for irradiation of materials where the source is exposed for irradiation purposes.

New License

20.2

4

80.9

Renewal

13.5

23

311.0

Amendment

2.7

45

120.1

G. Licenses issued pursuant to Subpart B of Part 32 of this chapter to distribute items containing byproduct material or quantities of byproduct material to persons generally licensed under Parts 31 and 35 of this chapter, except specific licenses authorizing redistribution of items which have been manufactured or imported under a specific license and licensed by the Commission.

New License

8.6

7

60.0

Renewal

10.3

11

113.5

Amendment

6.3

29

182.0

INFORMATION FOR LICENSE FEESPROFESSIONAL PROCESSING TIMESAFETY REVIEW  
STAFF HOURSFY80 & FY81 PPSAS DATAPRESENT FEE CATEGORIES

## 3. BYPRODUCT MATERIAL - CON'T

G. for distribution to persons generally licensed under Parts 31 or 35 of this chapter.

H. Licenses issued pursuant to Subpart A of Part 32 of this chapter to distribute items containing byproduct material or quantities of byproduct material to persons exempt from the licensing requirements of Part 30 of this chapter, except (1) §§ 32.11 and 32.18 of this chapter, (2) specific licenses authorizing redistribution of items and quantities which have been manufactured or imported under a specific license and licensed by the Commission for distribution to persons exempt from the licensing requirements of Part 30 of this chapter, and (3) specific licenses which authorize distribution of timepieces, hands and dials.

New License

Renewal

Amendment

LowHighAverageCASESSTAFF HOURS

10.0

10

100.1

3.6

24

87.5

2.1

56

115.0

OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

Enclosure 1

INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME

FY80 & FY81 PPSAS DATA

PRESENT FEE CATEGORIES

SAFETY REVIEW  
STAFF HOURS

Low High Average

CASES

STAFF HOURS

3. BYPRODUCT MATERIAL - CON'T

I. Licenses issued pursuant to § 32.18 of this chapter to distribute quantities of byproduct material to persons exempt from the licensing requirements of Part 30 of this chapter.

New License

8.7

3

26.0

Renewal

4.9

12

58.5

Amendment

0.3

6

2.0

J. Licenses issued pursuant to § 32.14 of this chapter to distribute timepieces, hands and dials, containing hydrogen 3 or promethium 147 to persons exempt from the licensing requirements of Part 30 of this chapter.

New License

4.4

8

35.0

Renewal

5.6

5

28.0

Amendment

0.9

23

21.0

K. Licenses for possession and use of byproduct material for research and development, except those licenses covered by Categories 3A or 3B, and licenses covered by Categories 7B or 7C authorizing medical research

New License

18.4

53

977.5

Renewal

15.8

86

1359.5

Amendment

2.6

480

1237.9



OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDSINFORMATION FOR LICENSE FEESPROFESSIONAL PROCESSING TIMEFY80 & FY81 PPSAS DATASAFETY REVIEW  
STAFF HOURSPRESENT FEE CATEGORIES

		<u>Low</u>	<u>High</u>	<u>Average</u>	<u>CASES</u>	<u>STAFF HOURS</u>
3. BYPRODUCT MATERIAL - CON'T						
L. All other specific byproduct material licenses, except those in Categories 4A through 10B.	New License			2.9	926	2671.0
	Renewal			4.6	607	2709.5 ✓
	Amendment			1.5	2049	3082.4
4. WASTE DISPOSAL						
B. Waste disposal licenses specifically authorizing the receipt of waste byproduct material, source material, or special nuclear material from other persons for the purpose of packaging the material. The licensee will dispose of the material by transfer to another person authorized to receive or dispose of the material.	New License			23.5	3	70.5
	Renewal			10.0	1	10.0
	Amendment			4.0	11	44.0 ✓
C. Waste disposal licenses specifically authorizing the receipt of <u>prepackaged</u> waste byproduct material, source material, or special nuclear material from other persons. The licensee will dispose of the material by transfer to another person authorized to receive or dispose of the material.	New License			-	0	0
	Renewal			-	0	0
	Amendment			-	0	0

OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

Enclosure 1

INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME

FY80 & FY81 PPSAS DATA

PRESENT FEE CATEGORIES

SAFETY REVIEW  
STAFF HOURS

Low      High      Average

CASES

STAFF HOURS

5. WELL LOGGING AND WELL SURVEYS  
AND TRACER STUDIES

A. Licenses for possession  
and use of specific nuclear  
material and/or byproduct  
material for well logging,  
well surveys, and tracer  
studies.

New License

6.2

47

291.0

Renewal

23.8

13

309.2

Amendment

4.0

98

395.7

6. NUCLEAR LAUNDRIES

A. Licenses for commercial  
collection and laundry of  
items contaminated with  
byproduct material,  
source material, or special  
nuclear material.

New License

-

2

0

Renewal

2.0

1

2.0

Amendment

0.5

3

1.5

7. HUMAN USE OF BYPRODUCT  
MATERIAL, SOURCE MATERIAL, OR  
SPECIAL NUCLEAR MATERIAL

A. Licenses issued pursuant  
to Parts 30, 40, and 70  
of this chapter for human  
use of byproduct material,  
source material, or special  
nuclear material in sealed  
sources contained in  
teletherapy devices.

New License

6.8

37

252.4

Renewal

4.7

151

713.6

Amendment

5.2

517

2676.7

OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDSINFORMATION FOR LICENSE FEESPROFESSIONAL PROCESSING TIMEFY80 & FY81 PPSAS DATAPRESENT FEE CATEGORIES

		<u>SAFETY REVIEW STAFF HOURS</u>				
		<u>Low</u>	<u>High</u>	<u>Average</u>	<u>CASES</u>	<u>STAFF HOURS</u>
7.	HUMAN USE OF BYPRODUCT MATERIAL, SOURCE MATERIAL, OR SPECIAL NUCLEAR MATERIAL					
B.	Licenses issued pursuant to Parts 30, 40, and 70 of this chapter to medical institutions, or two or more physicians on a single license, for human use of byproduct material, source material, or special nuclear material, except licenses in Category 7A.	New License		8.2	108	364.1
		Renewal		9.5	455	4309.2 ✓
		Amendment		3.0	2078	6131.8 ✓
C.	Licenses issued pursuant to Parts 30, 40, and 70 of this chapter to an individual physician for human use of byproduct material, source material, or special nuclear material, except licenses in Category 7A.	New License		0.3	24	6.5
		Renewal		7.5	16	119.4 ✓
		Amendment		0.7	162	110.0
8.	CIVIL DEFENSE					
A.	Licenses for possession and use of byproduct material, source material, or special nuclear material for civil defense activities.	New License		8.0	3	24.0 ✓
		Renewal		4.6	11	50.5
		Amendment		1.4	36	50.0 ✓

# INFORMATION FOR LICENSE FEES

## PROFESSIONAL PROCESSING TIME

### SAFETY REVIEW STAFF HOURS

Low      High      Average

## FY80 & FY81 PPSAS DATA

CASES

STAFF HOURS

## PRESENT FEE CATEGORIES

9. DEVICE, PRODUCT, OR SEALED  
SOURCE SAFETY EVALUATION
- A. Safety evaluation of  
devices or products  
containing byproduct  
material, source  
material, or special  
nuclear material, except  
reactor fuel devices and  
devices or products  
distributed to general  
licensees or persons  
exempt from the require-  
ments for a license  
pursuant to Parts 30, 40,  
and 70 of this chapter.

Evaluation

- B. Safety evaluation of  
sealed sources containing  
byproduct material, source  
material, or special  
nuclear material except  
reactor fuel and sealed  
sources distributed to  
general licensees or  
persons exempt from the  
requirements for a license  
pursuant to Parts 30, 40,  
and 70 of this chapter.

Evaluation

Fee categories 9A & 9B

19.5

100

1952.0

OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

Enclosure 1

INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME

FY80 & FY81 PPSAS DATA

PRESENT FEE CATEGORIES

10. POWER SOURCE

A. Licenses for the manufacture and distribution of encapsulated byproduct material or special nuclear material for use in power generation, except reactor fuel.

New License

Renewal

Amendment

SAFETY REVIEW  
STAFF HOURS

Low

High

Average

1.0

-

1.0

CASES

STAFF HOURS

4

4.0

0

0

7

7.0



OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

INFORMATION FOR LICENSE FEES

PROFESSIONAL & LICENSING ASSISTANT PROCESSING TIME

FY80 & FY81 PPSAS DATA

PRESENT FEE CATEGORIES

		<u>SAFETY REVIEW STAFF HOURS</u>			<u>CASES</u>	<u>STAFF HOURS</u>
		<u>Low</u>	<u>High</u>	<u>Average</u>		
1. SPECIAL NUCLEAR MATERIAL						
I. Licenses for possession and use of special nuclear material in sealed sources contained in devices used in industrial measuring systems.	New License					
	Renewal					
	Amendments					
J. All other special nuclear material licenses, except licenses authorizing special nuclear material in unsealed form in combination that would constitute a critical quantity as defined in § 150.11 of Part 150 which shall pay the same rate as Category 1A and special nuclear material for use in power generation which shall pay the fee in Category 10.	New License					
	Renewal					
	Amendments					
2. SOURCE MATERIAL						
D. All other source material licenses (Does not include milling, in-situ leaching heap leaching, refining uranium mill concentrates to UF <sub>6</sub> ore buying stations and ion exchange facilities.)	New License			19.8	10	198.0
	Renewal			7.4	47	346.2
	Amendments			4.3	121	518.8

1/ Professional Staff Hours

OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

INFORMATION FOR LICENSE FEES

PROFESSIONAL & LICENSING ASSISTANT PROCESSING TIME

FY80 & FY81 PPSAS DATA

PRESENT FEE CATEGORIES

3. BYPRODUCT MATERIAL

SAFETY REVIEW  
STAFF HOURS

Low                  High                  Average

CASES

STAFF HOURS

A. License for possession and use of byproduct material issued pursuant to Parts 30 and 33 of this chapter for processing or manufacturing of items containing byproduct material for commercial distribution.	New License	1.5	38	56.0
	Renewal	4.3	48	204.5
	Amendment	0.8	173	139.5
B. Licenses issued pursuant to §§ 32.77, 32.73 and 32.74 of this chapter authorizing the processing or manufacturing and distribution of radio-pharmaceuticals, generators or reagents kits, and sources and devices, containing byproduct material.	New License			
	Renewal			
	Amendment			
C. Licenses for byproduct material issued pursuant to Part 34 of this chapter for industrial radiography operations at one location.	New License	22.4	11	246.0
	Renewal	14.0	51	715.3
	Amendment	2.4	109	297.9
D. Licenses for byproduct material issued pursuant to Part 34 of this chapter for industrial radiography operations at more than one location.	New License	10.9	19	206.5
	Renewal	30.3	49	1517.5
	Amendment	7.5	101	800.7

## INFORMATION FOR LICENSE FEES

PROFESSIONAL &amp; LICENSING ASSISTANT PROCESSING TIME

FY80 &amp; FY81 PPSAS DATA

## PRESENT FEE CATEGORIES

SAFETY REVIEW  
STAFF HOURS

## 3. BYPRODUCT MATERIAL - CON'T

E. Licenses for possession and use of byproduct material in sealed sources for irradiation of materials where the source is not removed from its shield (self-shielded units).

New License

Renewal

Amendment

F. Licenses for possession and use of byproduct material in sealed sources for irradiation of materials where the source is exposed for irradiation purposes.

New License

Renewal

Amendment

G. Licenses issued pursuant to Subpart B of Part 32 of this chapter to distribute items containing byproduct material or quantities of byproduct material to persons generally licensed under Parts 31 and 35 of this chapter, except specific licenses authorizing redistribution of items which have been manufactured or imported under a specific license and licensed by the Commission.

New License

Renewal

Amendment

LowHighAverageCASESSTAFF HOURS

12.6

7

88.0

12.6

11

138.0

7.2

29

209.5

# INFORMATION FOR LICENSE FEES

## PROFESSIONAL & LICENSING ASSISTANT PROCESSING TIME

### SAFETY REVIEW STAFF HOURS

Low      High      Average

## FY80 & FY81 PPSAS DATA

CASES

STAFF HOURS

## PRESENT FEE CATEGORIES

### 3. BYPRODUCT MATERIAL - CON'T

- G. for distribution to persons generally licensed under Parts 31 or 35 of this chapter.
- H. Licenses issued pursuant to Subpart A of Part 32 of this chapter to distribute items containing byproduct material or quantities of byproduct material to persons exempt from the licensing requirements of Part 30 of this chapter, except (1) §§ 32.11 and 32.18 of this chapter, (2) specific licenses authorizing redistribution of items and quantities which have been manufactured or imported under a specific license and licensed by the Commission for distribution to persons exempt from the licensing requirements of Part 30 of this chapter, and (3) specific licenses which authorize distribution of timepieces, hands and dials.

New License

Renewal

Amendment



JAN 26 1982

MEMORANDUM FOR: Daniel J. Donoghue, Director  
Office of Administration

FROM: John G. Davis, Director  
Office of Nuclear Material Safety  
and Safeguards

SUBJECT: PROPOSED LICENSE FEE SCHEDULE REVISION  
(SECY 81-615)

In response to your January 4, 1982 memo, enclosed are charts showing the allocation of FY 1982 professional direct and all other (professional support) staff years for the Material Licensing Branch (Encl. 1) and the Material Certification and Procedures Branch (Encl. 2). These resources are summarized in the Materials Licensing Decision Unit chart (Encl. 3) to indicate the total resources allocated to the Materials Licensing function in NMSS.

In response to Bill Miller's January 8, 1982 memo, Enclosure 4 shows the range of professional staff hours expended on applications for new licenses, amendments and renewals in the small materials programs. The minimum (low) and maximum (high) time figures are estimates by the licensing staff since data is not maintained on a case-by-case basis. The averages, for the most part, are based on cases completed and hours charged to specific case types during FY81. In those instances where no data were available, the midpoint between the minimum and maximum estimated time figures was arbitrarily chosen. In compiling Enclosure 4, we noted that the FY81 average staff effort for reviewing a new license application is about half of the average staff effort used in FY 1977; the FY 1981 average staff effort for reviewing a renewal application is approximately twice the average staff effort used in FY 1977; and the average staff expenditures for amendments are almost the same. Please note that there are no environmental or safeguards reviews or contractual assistance associated with the issuance of materials licenses.

Currently, amendments to sealed source and device evaluations, fee categories 9A and 9B, are fee exempt. Since reviews for these amendment requests are identical to other materials license amendment requests, for which fees are charged, consideration should be given to making sealed source and device amendments a fee item.

In response to your question about the review of the suitability of the five-year expiration limit for materials licenses, the results of that review were published in SECY 78-284. That Commission Paper recommended continuation of the five-year term.

~~8342184297~~

OFFICE						
URNAME						
DATE						



JAN 26 1982

In closing, I feel it is important to note that shifting from the current method of charging license fees by category of license application to a fee program based on actual costs would not increase the revenues to the NRC if the fees are based on up-to-date data regarding the average time required to review a given category of application. Such an actual cost fee program would, however, significantly increase the administrative burden on NMSS, since we would have to keep track of staff time expenditures on a case-by-case basis for over 5,000 cases per year, each of which averages less than 5 hours of review time. Thus, my recommendations are to retain the current method of charging license fees by category of materials license, to cancel the exemptions for amendments of sealed sources and devices, and to update the fee schedule to reflect the data shown in Enclosure 4.

Claudia Seelig (NMSS/PSB/74072) is the NMSS contact for license fee matters. Both Claudia and Elise Heumann (NMSS/FC/74167) are prepared to assist your staff in interpreting the enclosed data.

(Signed) John G. Davis

John G. Davis, Director  
Office of Nuclear Material Safety  
and Safeguards

Enclosures: As stated

Distribution:

File 2.6

C. Seelig -

J. Evans

E. Heumann -

NMSS r/f

J. Davis r/f -

ABentley 820005

W. A. Miller - AR 2015

OFFICE	NMSS:PSB	NMSS:PSB	NMSS:PSB	NMSS A			
NAME	J. Evans/lm	C. Seelig	RSBrown, Jr.	JGDavis			
DATE	1/14/82	1/22/82	1/27/82	1/24/82			

1/22/82

Materials Licensing BranchFY82

<u>Activity</u>	<u>Professional Direct SY</u>	<u>All Other SY</u>	<u>Total</u>
@ Licensing Case Reviews*	12.8	3.7	16.5
@ Licensing Assistance Section	12.1	---	12.1
Licensing Site Visists	1.0	0.1	1.1
Agreement States Assistance	1.0	0.1	1.1
Periodic Review of Regulations	---	---	---
Development of Regulatory Guides	---	---	---
Advisory Committee on the Medical Uses of Isotopes	1.3	0.1	1.4
@ Adminstrative Responsibilities*	4.5	---	4.5
	<hr/>	<hr/>	<hr/>
TOTALS	32.7	4.0	36.7

\* From the FY81 PPSAS, the license reviewers spent 74% of their time licensing and 26% of their time in administrative responsibilities (MD&S codes). This branch has 30.8 SY budgeted for licensing reviews, of which 13.5 SY is for the Licensing Assistance Section.(12.1 SY devoted to this branch's activities and 1.4 SY devoted to MCP branch.) This leaves 17.3 SY.  
 $17.3 \times 74\% = 12.8$        $17.3 \times 26\% = 4.5$

@ These items are part of the first planned accomplishment shown in Enclosure 3.

1/22/82

Material Certification and Procedures BranchFY82

<u>Activity</u>	<u>Professional Direct SY</u>	<u>All Other SY</u>	<u>Total</u>
@ Licensing Case Reviews*	2.6	0.8	3.4
@ Licensing Assistance Section	1.4	---	1.4
Licensing Site Visists	---	---	---
Agreement States Assistance	---	---	---
Periodic Review of Regulations	1.0	0.5	1.5
Development of Regulatory Guides	1.2	0.7	1.9
Advisory Committee on the Medical Uses of Isotopes	---	---	---
@ Adminstrative Responsibilities*	0.9	---	0.9
	<hr/>	<hr/>	<hr/>
TOTALS	7.1	2.0	9.1

\* From the FY81 PPSAS, this branch charged a total of 17,571 hours, of which 4,664.5 hours were in administrative responsibilities (MD&S codes), (26.5%). This branch has 3.5 SY budgeted for licensing reviews.  
 $3.5 \times 73.5\% = 2.6 \text{ SY}$   
 $3.5 \times 26.5\% = 0.9 \text{ SY}$

@ These items are part of the first planned accomplishment shown in Enclosure 3.

Materials Licensing Decision Unit

FY82

<u>FY82 Operating Plan Planned Accomplishment</u>	<u>Professional Direct SY</u>	<u>All Other SY</u>	<u>Total</u>
Licensing Case Reviews*	34.3	4.5	38.8
Licensing Site Visists	1.0	0.1	1.1
Agreement States Assistance	1.0	0.1	1.1
Periodic Review of Regulations	1.0	0.5	1.5
Development of Regulatory Guides	1.2	0.7	1.9
Advisory Committee on the Medical Uses of Isotopes	1.3	0.1	1.4
	<hr/>	<hr/>	<hr/>
TOTALS	39.8	6.0	45.8

\*This planned accomplishment in the NMSS FY82 Operating Plan includes three activities as shown on Enclosures 1 and 2. Those are (1) the actual review of license applications by the professional staff, (2) licensing support by the Licensing Assistance Section, and (3) administrative actions (e.g. FOIA's) performed by the professional staff. Those items are identified by an "@" on Enclosures 1 and 2.

OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME

PROJECTED FY 82 RESOURCE COMMITMENT

PRESENT FEE CATEGORIES

1. SPECIAL NUCLEAR MATERIAL

- |   |             |
|---|-------------|
| I. Licenses for possession and use of special nuclear material in sealed sources contained in devices used in industrial measuring systems.   | New License |
|   | Renewal     |
|   | Amendments  |
| J. All other special nuclear material licenses, except licenses authorizing special nuclear material in unsealed form in combination that would constitute a critical quantity as defined in § 150.11 of Part 150 which shall pay the same rate as Category 1A and special nuclear material for use in power generation which shall pay the fee in Category 10. | New License |
|   | Renewal     |
|   | Amendments  |

SAFETY REVIEW  
STAFF HOURS

Low

High

Average

CASES

STAFF HOURS

0.5

8.0

4.0

0

0

0.5

8.0

1.0

9

9.0

0.5

8.0

1.0

35

35.0

0.5

24.0

1.0

3

3.0

0.5

24.0

12.0

6

72.0

0.5

24.0

12.0

0

0

2. SOURCE MATERIAL

- |  |             |
|--|-------------|
| D. All other source material licenses (Does not include milling, in-situ leaching heap leaching, refining uranium mill concentrates to UF <sub>6</sub> ore buying stations and ion exchange facilities.) | New License |
|  | Renewal     |
|  | Amendments  |

0.5

40.0

29.7

5

148.5

0.5

40.0

9.8

19

186.2

0.5

40.0

3.5

64

224.0

1/ Professional Staff Hours

Enclosure  
1/22/82



OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

INFORMATION FOR LICENSE FEES

PROJECTED FY 82 RESOURCE COMMITMENT

PROFESSIONAL PROCESSING TIME

SAFETY REVIEW  
STAFF HOURS

PRESENT FEE CATEGORIES

3. BYPRODUCT MATERIAL

		Low	High	Average	CASES	STAFF HOURS
A. Licenses for possession and use of byproduct material issued pursuant to Parts 30 and 33 of this chapter for processing or manufacturing of items containing byproduct material for commercial distribution.	New License	2.0	40.0	4.8	21	100.8
	Renewal	2.0	40.0	3.6	31	111.6
	Amendment	0.5	40.0	1.3	125	162.5
B. Licenses issued pursuant to §§ 32.72, 32.73 and 32.74 of this chapter authorizing the processing or manufacturing and distribution of radioactive pharmaceuticals, generators or reagents kits, and sources and devices, containing byproduct material.	New License	20.0	48.0	31.7	6	190.2
	Renewal	8.0	30.0	13.0	10	130.0
	Amendment	0.5	30.0	2.9	80	232.0
C. Licenses for byproduct material issued pursuant to Part 34 of this chapter for industrial radiography operations at one location.	New License	3.0	32.0	24.2	5	121.0
	Renewal	3.0	32.0	14.7	39	573.3
	Amendment	0.5	32.0	2.6	74	192.4
D. Licenses for byproduct material issued pursuant to Part 34 of this chapter for industrial radiography operations at more than one location.	New License	4.0	40.0	11.0	21	231.0
	Renewal	4.0	40.0	19.9	51	1014.9
	Amendment	0.5	40.0	4.1	118	483.8

OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME

PROJECTED FY 82 RESOURCE COMMITMENT

PRESENT FEE CATEGORIES

I. BYPRODUCT MATERIAL - CONT

SAFETY REVIEW  
STAFF HOURS

Low      High      Average

CASES

STAFF HOURS

E Licenses for possession and use of byproduct material in sealed sources for irradiation of materials where the source is not removed from its shield (self-shielded units).

New License

1.0      8.0      4.6

8

36.8

Renewal

1.0      8.0      1.8

29

52.2

Amendment

0.5      8.0      1.1

33

36.3

F. Licenses for possession and use of byproduct material in sealed sources for irradiation of materials where the source is exposed for irradiation purposes.

New License

4.0      40.0      36.2

2

72.4

Renewal

4.0      32.0      7.4

13

96.2

Amendment

0.5      32.0      2.1

26

54.6

G. Licenses issued pursuant to Subpart B of Part 32 of this chapter to distribute items containing byproduct material or quantities of byproduct material to persons generally licensed under Parts 31 and 35 of this chapter, except specific licenses authorizing redistribution of items which have been manufactured or imported under a specific license and licensed by the Commission

New License

2.0      24.0      16.7

3

50.1

Renewal

2.0      24.0      7.9

10

79.0

Amendment

0.5      24.0      7.3

17

124.1

OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME

PROJECTED FY 82 RESOURCE COMMITMENT

PRESENT FEE CATEGORIES

3. BYPRODUCT MATERIAL - CONT

SAFETY REVIEW  
STAFF HOURS

Low

High

Average

CASES

STAFF HOURS

for distribution to persons generally licensed under Parts 31 or 35 of this chapter.

H. Licenses issued pursuant to Subpart A of Part 32 of this chapter to distribute items containing byproduct material or quantities of byproduct material to persons exempt from the licensing requirements of Part 30 of this chapter, except (1) §§ 32.11 and 32.18 of this chapter, (2) specific licenses authorizing redistribution of items and quantities which have been manufactured or imported under a specific license and licensed by the Commission for distribution to persons exempt from the licensing requirements of Part 30 of this chapter, and (3) specific licenses which authorize distribution of timepieces, hands and dials.

New License

Renewal

Amendment

2.0

24.0

6.3

6

37.8

2.0

24.0

5.2

12

62.4

0.5

24.0

2.1

30

63.0

OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME

PROJECTED FY 82 RESOURCE COMMITMENT

PRESENT FEE CATEGORIES

3. BYPRODUCT MATERIAL - CON'T

		<u>SAFETY REVIEW STAFF HOURS</u>			<u>CASES</u>	<u>STAFF HOURS</u>
		<u>Low</u>	<u>High</u>	<u>Average</u>		
Licenses issued pursuant to § 32.18 of this chapter to distribute quantities of byproduct material to persons exempt from the licensing requirements of Part 30 of this chapter.	New License	2.0	32.0	25.3	1	25.3
	Renewal	2.0	24.0	3.3	9	29.7
	Amendment	0.5	24.0	12.0	4	48.0
J. Licenses issued pursuant to § 32.14 of this chapter to distribute timepieces, hands and dials, containing hydrogen 3 or promethium 147 to persons exempt from the licensing requirements of Part 30 of this chapter.	New License	2.0	24.0	8.1	2	16.2
	Renewal	2.0	24.0	9.0	2	18.0
	Amendment	0.5	24.0	0.8	11	8.8
K. Licenses for possession and use of byproduct material for research and development, except those licenses covered by Categories 3A or 3B, and licenses covered by Categories 7B or 7C authorizing medical research.	New License	0.5	40.0	13.1	36	471.6
	Renewal	0.5	40.0	12.1	43	520.3
	Amendment	0.5	40.0	1.9	283	537.7

OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME

PROJECTED FY 82 RESOURCE COMMITMENT

PRESENT FEE CATEGORIES

3. BYPRODUCT MATERIAL - CON'T

SAFETY REVIEW  
STAFF HOURS

Low                  High                  Average

CASES

STAFF HOURS

All other specific byproduct material licenses, except those in Categories 4A through 10B.	New License	0.5	40.0	4.6	449	2065.4
	Renewal	0.5	40.0	6.6	240	1584.0
	Amendment	0.5	24.0	2.5	957	2392.5
1. WASTE DISPOSAL						
B. Waste disposal licenses specifically authorizing the receipt of waste byproduct material, source material, or special nuclear material from other persons for the purpose of packaging the material. The licensee will dispose of the material by transfer to another person authorized to receive or dispose of the material.	New License	2.0	40.0	19.0	0	0
	Renewal	2.0	40.0	19.0	0	0
	Amendment	0.5	40.0	20.0	0	0
C. Waste disposal licenses specifically authorizing the receipt of <u>prepackaged</u> waste byproduct material, source material, or special nuclear material from other persons. The licensee will dispose of the material by transfer to another person authorized to receive or dispose of the material.	New License	2.0	40.0	24.3	2	48.6
	Renewal	2.0	40.0	10.0	1	10.0
	Amendment	0.5	40.0	0.8	5	4.0



OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME

PROJECTED FY 82 RESOURCE COMMITMENT

PRESENT FEE CATEGORIES

SAFETY REVIEW  
STAFF HOURS

5. WELL LOGGING AND WELL SURVEYS  
AND TRACER STUDIES

Low      High      Average

CASES

STAFF HOURS

- A. Licenses for possession and use of specific nuclear material and/or byproduct material for well logging, well surveys, and tracer studies.
- |             |  |
|-------------|--|
| New License |  |
| Renewal     |  |
| Amendment   |  |

2.0	32.0	6.4
2.0	32.0	26.6
0.5	32.0	4.1

31	198.4
8	212.8
62	254.2

6. NUCLEAR LAUNDRIES

- A. Licenses for commercial collection and laundry of items contaminated with byproduct material, source material, or special nuclear material.
- |             |  |
|-------------|--|
| New License |  |
| Renewal     |  |
| Amendment   |  |

4.0	32.0	18.0
4.0	32.0	2.0
0.5	32.0	1.0

1	18.0
1	2.0
3	3.0

7. HUMAN USE OF BYPRODUCT MATERIAL, SOURCE MATERIAL, OR SPECIAL NUCLEAR MATERIAL

- A. Licenses issued pursuant to Parts 30, 40, and 70 of this chapter for human use of byproduct material, source material, or special nuclear material in sealed sources contained in teletherapy devices.
- |             |  |
|-------------|--|
| New License |  |
| Renewal     |  |
| Amendment   |  |

4.0	40.0	6.6
2.0	40.0	5.6
0.5	40.0	4.3

24	158.4
81	453.6
324	1393.2

OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME

PROJECTED FY 82 RESOURCE COMMITMENT

PRESENT FEE CATEGORIES

HUMAN USE OF BYPRODUCT  
MATERIAL, SOURCE MATERIAL, OR  
SPECIAL NUCLEAR MATERIAL

B. Licenses issued pursuant  
to Parts 30, 40, and 70  
of this chapter to  
medical institutions, or  
two or more physicians on  
a single license, for  
human use of byproduct  
material, source material,  
or special nuclear material,  
except licenses in  
Category 7A.

New License  
Renewal  
Amendment

<u>Low</u>	<u>SAFETY REVIEW STAFF HOURS</u>		<u>Average</u>
	<u>High</u>		
4.0	24.0		11.2
2.0	24.0		11.3
0.5	24.0		3.5

CASES

STAFF HOURS

36  
199  
1265

403.2  
2248.7  
4427.5

C. Licenses issued pursuant  
to Parts 30, 40, and 70  
of this chapter to an  
individual physician for  
human use of byproduct  
material, source material,  
or special nuclear  
material, except licenses  
in Category 7A.

New License  
Renewal  
Amendment

4.0	24.0	6.0
2.0	24.0	9.6
0.5	24.0	2.2

29  
17  
95

174.0  
163.2  
209.0

CIVIL DEFENSE

A. Licenses for possession  
and use of byproduct  
material, source material,  
or special nuclear  
material for civil defense  
activities.

New License  
Renewal  
Amendment

1.0	16.0	8.6
1.0	16.0	4.3
0.5	16.0	1.9

2  
8  
18

17.2  
34.4  
34.2

OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME

PROJECTED FY 82 RESOURCE COMMITMENT

PRESENT FEE CATEGORIES

9. DEVICE, PRODUCT, OR SEALED  
SOURCE SAFETY EVALUATION

A. Safety evaluation of  
devices or products  
containing byproduct  
material, source  
material, or special  
nuclear material, except  
reactor fuel devices and  
devices or products  
distributed to general  
licensees or persons  
exempt from the require-  
ments for a license  
pursuant to Parts 30, 40,  
and 70 of this chapter.

Evaluation

	<u>Low</u>	<u>High</u>	<u>Average</u>
	8.0	80.0	19.5

CASES

STAFF HOURS

B. Safety evaluation of  
sealed sources containing  
byproduct material, source  
material, or special  
nuclear material except  
reactor fuel and sealed  
sources distributed to  
general licensees or  
persons exempt from the  
requirements for a license  
pursuant to Parts 30, 40,  
and 70 of this chapter.

Evaluation

8.0	80.0	19.5
-----	------	------

Fee categories 9A & 9B

19.5

100

1952.0

OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME

PROJECTED FY 82 RESOURCE COMMITMENT

PRESENT FEE CATEGORIES

D. POWER SOURCE

Licenses for the manufacture and distribution of encapsulated byproduct material or special nuclear material for use in power generation, except reactor fuel.

New License

Renewal

Amendment

SAFETY REVIEW  
STAFF HOURS

<u>Low</u>	<u>High</u>	<u>Average</u>
8.0	40.0	24.0
8.0	40.0	24.0
0.5	40.0	0.6

CASES

STAFF HOURS

0	0
0	0
5	3.0

JAN 21 1982

A51

MEMORANDUM FOR: Richard E. Cunningham, Director  
Division of Fuel Cycle and Material Safety

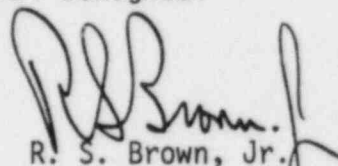
FROM: R. S. Brown, Jr.  
Assistant to the Director  
and Chief,  
Program Support Branch, NMSS

SUBJECT: PROPOSED LICENSE FEE REVISION (NMSS 82-05)

I have reviewed your response to Dan Donoghue's memo on the above subject. There are two questions in Mr. Donoghue's memo which still require answers. He wants to know the results of the review on the suitability of the five-year expiration limit for materials licenses. He also wants a contact designated that is familiar with the materials licensing expenditures. — *Elise Heumann*

SECY 78-284

The responses to these questions can either be provided to me and PSB will incorporate them into a memo from Mr. Davis to Mr. Donoghue; or if Fuel Cycle prefers, you can include them along with your previous response in a memo from Mr. Davis to Mr. Donoghue.



R. S. Brown, Jr.  
Assistant to the Director  
and Chief  
Program Support Branch, NMSS

~~8303100438~~